

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **20-08193**
)
Christopher M. Arrington,) **Chapter 13**
)
Debtor(s).) **Hon. Judge Jack B. Schmetterer**

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on March 31, 2021, at 10:00 a.m. I will appear before the Honorable Judge Jack B. Schmetterer, or any judge sitting in that judge's place, and present Debtors' Motion to Modify Plan, a copy of which is attached.

This motion will be presented and heard telephonically using AT&T Teleconference. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must call into the hearing using the following information-Toll Free Number: 1-877-366-1839; Access Code: 3900709.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movant(s): Christopher M. Arrington
By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, certifies that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on March 4, 2021, before 5:30 p.m.

To the following persons or entities who have been served via U.S. Mail:

Christopher M. Arrington
3395 147th Street, Apt. 3A
Midlothian, IL 60445

Credit Acceptance Corporation
Attn: Bankruptcy Dept.
25505 West 12 Mile Rd., Ste. 3000
Southfield, MI 48034

Premier Bankcard, LLC
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud, MN 56302-9617

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523

Village of Midlothian
14801 S. Pulaski Rd.
Midlothian, IL 60445

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MOTION TO MODIFY PLAN

NOW COMES the Debtor, **Christopher M. Arrington**, by and through his attorney, David M. Siegel & Associates, LLC, to present this Motion, and states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the U.S. District Court for the Northern District of Illinois.
- 2) On March 25, 2020, Debtor filed a petition for relief under Chapter 13 of Title 11 USC.
- 3) Debtor's Plan was confirmed on July 22, 2020, with payments of \$250.00 per month and general unsecured creditors receiving not less than 10% of their claims.
- 4) Debtor lost his job in September of 2020. Debtor began working for Novo Logistics in January 2021. Debtor works full-time for Novo Logistics.
- 5) Debtor seeks to modify his plan under 11 U.S.C. § 1329 to defer the current default and increase his plan payment to \$400 per month which he can afford based on his amended Schedules I and J (Exhibit A).
- 6) The Debtor seeks this relief without the intent to defraud creditors.

WHEREFORE, the Debtor, **Christopher M. Arrington**, prays that this Honorable Court enter an Order Modifying Debtor's Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II
Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor